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STATE OF ILLINOIS COMMERCE COMMISSION ILLINOIS COMMERCE COMMISSION

Illinois Bell Telephone Company	98-0252
Application for Review of Alternative) Regulation Plan))
Illinois Bell Telephone Company	98-0335
Petition to rebalance Illinois Bell Telephone) Company's Carrier Access and Network))
Access Line Rates.	(cons.)
Citizens Utility Board and	·
The People of the State of Illinois -vs-)	! !
Illinois Bell Telephone Company	00-0764
Verified Complaint for a Reduction in Illinois) Bell Telephone Company's Rates and Other) Relief.)	00-0704

MOTION FOR LEAVE TO FILE INSTANTER

NOW COMES the Staff of the Illinois Commerce Commission ("Staff"), by its counsel, and hereby submits this Motion For Leave To File Instanter Staff's Reply Brief On The Effects Of HB 2900. In support of this Motion, Staff states:

- 1. The parties' Reply Briefs on the effects of HB 2900 were due on August 13, 2001.
- 2. In spite of Staff's best efforts, Staff was unable to meet this filing deadline.
- 3. No party will be prejudiced by the filing of Staff's Reply Brief one day out of time, as there is no right to respond to it.

4. The filing of Staff's Brief one day out of time is not for the purpose of delaying the resolution this proceeding, but is required for completeness of the record.

WHEREFORE, for the foregoing reasons, Staff respectfully requests that it be permitted to file its Reply Brief On The Effects Of HB 2900 on this 14th day of August, 2001.

Respectfully submitted,

David L. Nixon

Counsel for the Staff of the Illinois Commerce Commission

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Bell Telephone Company's Rates and Other Relief.))

NOTICE OF FILING

PLEASE TAKE NOTICE that we have on this 14th day of August, 2001, filed with the Chief Clerk of the Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois, the Reply Brief on the Effects of HB 2900 of the Staff of the Illinois Commerce Commission and the Motion For Leave To File Instanter, a copy of which is hereby served upon you.

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